



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 14, 2015

Mr. John D. Wagner, PE, REM, CSP
Director of Health, Safety & Environmental Affairs
Diamond Chrome Plating, Incorporated
604 South Michigan Avenue
P.O. Box 557
Howell, MI 48844

SRN: A2931, Livingston County

Dear Mr. Wagner:

On October 28, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received an electronic copy of the ductwork inspection records for the third quarter of 2015 for Diamond Chrome Plating, Incorporated (DCP). These records were reviewed to determine DCP's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, and Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and the First Amended Consent Decree (FACD)

The FACD, Paragraph 5.3(b) requires that:

"On and after the Effective Date, Defendant shall inspect all ductwork and control equipment at the Property each day the Facility is in production to identify any release of an air contaminant to the environment that fails to be appropriately conveyed to the control equipment for control and removal. All releases must be repaired within forty-eight (48) hours of being identified. Defendant shall conduct and maintain at the Property a written record that identifies the person(s) conducting the required inspection, any release(s) identified during the inspection, the ductwork segment for each release identified, and the date any release is repaired. Defendant shall submit a copy of the written record to the AQD Project Coordinator on the same day it submits Progress Reports as required under Paragraph 6.11, and additionally upon written or verbal request."

In the Roof Area Inspection Forms for the third quarter of 2015, it was noted on which dates leaks or weeps were discovered, and on which dates the leaks/weeps were repaired, as required by Paragraph 5.3(b). It was not noted, however, on which dates the leaks/weeps were cleaned. As noted on the Roof Area Inspection Forms, it is required that they be cleaned within 24 hours of discovery. DCP's Storm Water Pollution Prevention Plan or SWPPP, which is an enforceable part of DCP's National Pollutant Discharge Elimination System (NPDES) permit and Paragraph 5.4(a) of the FACD, states that DCP will clean weeps on the same day of discovery, with repair occurring as soon as possible but no later than 48 hours from the discovery of the weep. Active weeps will be cleaned regularly until the repair is complete.

During the September 16, 2015 inspection of DCP by AQD, it was evident that cleaning activities had in fact been carried out when leaks/weeps were identified, as the ductwork was seen to be clean. There may have been an assumption, when the records were filled out, that identification of a leak/weep implied that cleaning also took place that same day. To avoid misunderstandings in the future, please note the dates on which the cleaning took place.

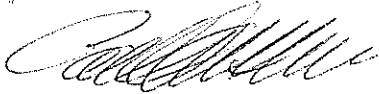
Additionally, for the date of September 15, 2015, it was noted that leaks/weepers were identified at "Various, SH 30, V 6." It is unclear if the various leaks were in addition to duct sections SH30 and V6, or if the various leaks consisted solely of SH30 and V6. How many leaks were present in each duct segment is also unclear. Each release must be documented as stated in the FACD. Please advise as to the intent of this entry. Also, please avoid terms such as "various" in future reports, when identifying duct sections, as there may be more than one interpretation of such terms.

Additionally, the FACD, Paragraph 5.3(e) requires that:
"After the Effective Date, Defendant shall replace each and any ductwork segment within sixty (60) days for which ten (10) releases are identified."

We are requesting that DCP inform the DEQ of how DCP is tracking the number of releases per ductwork segment (database, etc.), to assure compliance.

Thank you for your attention to the issues described. If you have any questions regarding these issues, or the actions necessary for this facility to remain in compliance, please contact DEQ staff at the telephone numbers listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638



Carla Davidson
Senior Environmental Quality Analyst
Water Resources Division
517-243-1249

DAM:TG

cc/via e-mail: Mr. Richardl Kuhl, DAG
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Brad Myott, DEQ
Ms. Nicole Zacharda, DEQ